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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 2, 2004

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EDMC

Mr. Chris Smith
100 Area Project Manager
United States Department of Energy
P.O. Box 550, MSIN: A3-04
Richland, Washington 99352

Dear Mr. Smith:

Re: Washington State Department of Ecology Comments on "Remedial Design Report/Remedial Action Work Plan for the 100 Area" dated February 2004, Revision 5, Draft B Redline

Enclosed are the Washington State Department of Ecology's (Ecology) comments on the referenced document. Ecology is separately preparing an Explanation of Significant Difference to update the 100 Area Records of Decision to include the applicable portions of Washington Administrative Code 173-340. This Revision 5 of the Remedial Design Report/Remedial Action Work Plan does not need to include the updates, but the next revision will need to do so.

If you have any questions, please contact Beth Rochette at (509) 736-3020 or me at (509) 736-3029.

Sincerely,

John B. Price
Environmental Restoration Project Manager
Nuclear Waste Program

cc: Larry Gadbois, EPA
Ella Feist, BHI
Todd Martin, HAB
Stuart Harris, CTUIR
Pat Sobotta, NPT

Russell Jim, YN
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Environmental Portal
Administrative Record: 100 Area

**Washington State Department of Ecology Comments on
Remedial Design Report/Remedial Action Work Plan for the 100 Area
(DOE/RL-96-17, Rev. 5, Draft B)**

Index	Section/Page/ Paragraph	Comment
1.	General	The year of WAC 173-340 must be added each time this regulation is cited. The citations in this document are generally not accurate when applied to the new regulation. Several specific comments about this are given below.
2.	Section 1.3, Page 1-2	Tables 1-1 through 1-6 were removed since the last revision. This section should indicate their removal with strikeouts. Please provide an explanation for removing these tables.
3.	Section 2.1.1, page 2-1, RAO 1, 1 st paragraph	The statement previously at the end of this paragraph stated that 10 CFR 20 has been withdrawn and no longer applies. This statement should be present here and indicated with a knockout. Does 10 CFR 20 apply?
4.	Section 2.1.1, page 2-1, RAO 1, top of page	Please add the year associated with the WAC 173-340 regulation. WAC 173-340-740(6)(c) is now (in the 2001 regulation) specific to soil cleanup for protection from vapors.
5.	Section 2.1.2, page 2-3, 1 st bullet	Add the following statement to this bullet: WAC 173-340, 1996, is currently the basis for nonradionuclide constituent (including uranium metal) cleanup levels, since the interim action RODs predate WAC 173-340, 2001.
6.	Section 2.1.2.1, page 2-4, 1 st paragraph	WAC 173-340-705 describes use of Method B. It does not specify actual cleanup levels as implied. Again, give the year of WAC 173-340 and correct this statement by replacing the word "specifies" with "describes".
7.	Section 2.1.2.3, page 2-7, 1 st paragraph	WAC 173-340-720(3) is now Method A groundwater cleanup levels. Please add the year to the citation of the WAC 173-340.
8.	Section 3.4.5 page 3-12, 3 rd bullet and Section 3.4.6, page 3-13, 3 rd bullet	Please change the second sentence in each bullet to the following: If additional review time is necessary, the review time can be increased up to a total of 45 days. This is consistent with the Tri-Party Agreement.
9.	Section 3.6, page 3-16, 2 nd paragraph	Please strike the last sentence of this paragraph. Ecology will look at confirmatory sampling schemes for candidate sites on a site-by-site basis.
10.	Section 3.6.1, page 3-17, 2 nd paragraph of section	Please change this paragraph back to how it used to be. The changes that have been made to this paragraph are not acceptable. Sampling should be more rigorous for sites that will not be remediated, and sampling should ensure that sufficient samples are taken to confirm that the site will not pose a hazard if left in place.
11.	Section 3.6.1, page 3-17, 2 nd paragraph and Section 3.6.7	Please indicate that decision rules are discussed in Section 3.6.5, rather than Section 3.6.4.
12.	Figure 3-3, page 3-29	Please add footnote g (or correct the second footnote e).
13.	Appendix D, page D-3	The equation at the bottom of the page relating concentration in groundwater with time and half-life is not appropriate for inorganic chemicals (nonrads). They have a decay half-life of infinity. Setting half-life to infinity would make $T/(t_{1/2})$ approach zero. If this equation must be used for inorganic chemicals, set their half-lives to infinity.